

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|-----------------------------------|
| In re: | : | |
| | : | Case No.: 18-17604 |
| Ross E. Baker | : | Chapter 13 |
| | : | Judge Magdeline D. Coleman |
| Debtor(s) | : | ***** |
| | : | |
| Wells Fargo Bank, N.A., d/b/a Wells | : | |
| Fargo Auto | : | |
| Movant | : | |
| | : | |
| v. | : | |
| | : | |
| Ross E. Baker | : | |
| Meaghan Maureen Baker | : | |
| William C. Miller, Esq. | : | |
| Respondents | : | |

CERTIFICATE OF DEFAULT

Now comes Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto, its successor and assigns (hereinafter, "Creditor") by and through counsel, and certifies to this Court that Ross E. Baker ("Debtor") has failed to comply with the Order approving the stipulation dated October 6, 2020, a copy of which is attached hereto as Exhibit "A", by failing to make timely payments in accordance with the stipulation. Pursuant to the Order, the automatic stay will terminate upon the filing of a Certificate of Default.

Creditor hereby avers that Debtor is delinquent for the November 17, 2020 payment and for all arrears that were due thereafter. Further, pursuant to the terms of the stipulation, Creditor provided Debtor and their Counsel with a Notice of Default on July 2, 2021, allowing Debtor ten (10) days to cure the default. A copy of said default letter is attached hereto as Exhibit "B". Ten (10) days have passed and the default has not been cured.

WHEREFORE, upon the filing of this Certificate of Default, Creditor requests that the Court enter an order terminating the automatic stay.

Respectfully submitted,

/s/ Sarah E. Barngrover

Sarah E. Barngrover, Esquire (323972)

Adam B. Hall (323867)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Sarah E. Barngrover.

Contact email is

sebarngrover@manleydeas.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|-----------------------------------|
| In re: | : | |
| | : | Case No.: 18-17604 |
| Ross E. Baker | : | Chapter 13 |
| | : | Judge Magdeline D. Coleman |
| Debtor(s) | : | ***** |
| | : | |
| Wells Fargo Bank, N.A., d/b/a Wells | : | |
| Fargo Auto | : | |
| Movant | : | |
| | : | |
| v. | : | |
| | : | |
| Ross E. Baker | : | |
| Meaghan Maureen Baker | : | |
| William C. Miller, Esq. | : | |
| Respondents | : | |

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Certificate of Default was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Esq., Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105,
ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Ross E. Baker, Sadek and Cooper, 1315 Walnut Street, Suite 502,
Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on July 23, 2021:

Ross E. Baker and Meaghan Maureen Baker, 1546 Webber Drive, Linwood, PA 19061

DATE: July 23, 2021

/s/ Sarah E. Barngrover

Sarah E. Barngrover, Esquire (323972)
Adam B. Hall (323867)
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Sarah E.

Barngrover.

Contact email is

sebarngrover@manleydeas.com